

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW

40 EXCHANGE PLACE

18TH FLOOR

NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE

(212) 482-1303 FAX

WWW.TALKINLAW.COM

EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:
5100 DORSEY HALL DRIVE
SUITE 100
ELLCOTT CITY, MD 21042
410-964-0300

NEW JERSEY OFFICE:
79 MAIN STREET
SUITE ONE
HACKENSACK, NJ 07601
201-342-6665

November 1, 2019

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. Sohrab Sharma
18 Cr. 340 (LGS)

Dear Judge Schofield:

Defendants Robert Farkas and Sohrab Sharma ("Defendants") respectfully submit this letter to request a one-week extension as to three pending filing deadlines: (1) Defendants' Reply to the government's Opposition to their Motion to Return Ether (DE 193) due November 4, 2019; (2) all parties' responses to the various filed motions in limine due November 6, 2019; and (3) the government's Opposition to Defendants' Motion for Reconsideration of the Court's Order on the Rule 15 Motion (DE 198) due November 11, 2019. The parties are actively engaged in plea negotiations and expect that any plea agreement will be reached within the next week. The above-listed filings will be directly affected by whether dispositions are reached in the instant case. If both defendants enter a plea of guilty, motion practice will cease, and the above responses and replies will be rendered moot. Should one defendant and not the other enter a plea of guilty, some motions will become moot and the reply or response to others will markedly change.

As the Court is aware, the motion practice in this case has been extensive and complex. Dispositions or a disposition of one defendant will simplify the issues presented to the Court. For this reason, defendants move for the one-week extension, which will allow the parties to expend resources on resolving the case or, at a minimum, streamlining the pending the pretrial litigation. The government does not oppose this application.

Page 2

November 1, 2019

Defendants apologize for the timing of this application. The attempt to resolve this case short of trial involves many moving parts that are difficult to coordinate in a short time frame. Thank you for Your Honor's consideration of this motion and continued patience.

Very truly yours,

Sanford Talkin

Sanford Talkin

cc: All Counsel by ECF